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11 *Attorneys for Defendants / Counter-Plaintiffs*
12 *IMPOSSIBLE LLC and JOEL RUNYON*

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN JOSE DIVISION**

16 IMPOSSIBLE FOODS INC.,

17 Plaintiff / Counter-Defendant,

18 v.

19 IMPOSSIBLE LLC and JOEL RUNYON,

20 Defendants / Counter-Plaintiffs.

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Case No. 5:21-cv-02419-BLF (SVK)

**JOINT STIPULATED REQUEST AND
[PROPOSED] ORDER MODIFYING
TIME TO RESPOND TO THIRD
AMENDED COMPLAINT**

Judge: Hon. Beth Labson Freeman

JOINT STIPULATED REQUEST TO MODIFY TIME TO RESPOND

Defendants/Counter-Plaintiffs Impossible LLC and Joel Runyon (together “Defendants/Counter-Plaintiffs”), and Plaintiff/Counter-Defendant Impossible Foods Inc. (“Plaintiff/Counter-Defendant”) (together, the “Parties”), hereby jointly stipulate as follows:

WHEREAS, on March 4, 2025, the Court granted Plaintiff/Counter-Defendant leave to file a Third Amended Complaint, Dkt. 149;

WHEREAS, on March 7, 2025, Plaintiff/Counter-Defendant filed the Third Amended Complaint in this action, adding claims to include fraud in the procurement of the incontestability status of trademark identified as USPTO Reg. No. 538758, fraud in the procurement of trademarks identified by USPTO Reg. Nos. 5590801, 5603025, 5620625, and 6571603, and abandonment of trademarks identified by USPTO Reg. Nos. 5590801, 5603025, and 6571603 against each Defendant/Counter-Plaintiff, Dkt. 151;

WHEREAS, on March 16, 2025, the Court issued a summons to Defendant/Counter-Plaintiff Joel Runyon, Dkt. 158;

WHEREAS, on March 18, 2025, counsel for Defendant/Counter-Plaintiff Joel Runyon agreed to accept service of the summons to Mr. Runyon; and

WHEREAS, Defendants/Counter-Plaintiffs share common counsel, defenses, and counterclaims, and expect to file a single, unified responsive pleading on behalf of both Defendants;

NOW THEREFORE, IT IS HEREBY STIPULATED THAT the deadline for Defendants/Counter-Plaintiffs to file their responsive pleading to the Third Amended Complaint shall be March 31, 2025, which is 14 days from the date of acceptance of service of the summons on behalf of Mr. Runyon.

IT IS SO STIPULATED.

Dated: March 20, 2025

Respectfully submitted,

BRAUNHAGEY & BORDEN LLP

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By: /s/ Adam S. Cashman
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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2025

Hon. Beth Labson Freeman
United States District Court Judge